

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DWIGHT RUSSELL, et al.,

Plaintiffs,

v.

HARRIS COUNTY, TEXAS, et al.,

Defendants.

Civil Action No. 4:19-cv-226
The Honorable Lee H. Rosenthal
U.S. District Judge

**ANSWER OF HONORABLE BRIAN E. WARREN, CHUCK SILVERMAN, AND LORI
C. GRAY IN THEIR OFFICIAL CAPACITY AS JUDGES OF THE 209TH, 183RD, AND
262ND DISTRICT COURTS, HARRIS COUNTY, TEXAS**

INTRODUCTION

Judges Brian E. Warren (“Judge Warren”), Chuck Silverman (“Judge Silverman”), and Lori C. Gray (“Judge Gray”) believe in felony bond reform that serves the interests of justice for all parties. They recognize that too often the distinguishing factor between those who face devastating hardships and those who do not is as simple as whether the arrestee has the means to pay the secured money bail amount. The devastating effects for pretrial detainees can include job loss, lost access to housing, separation from friends and family, and exposure to crowded conditions, which is especially dangerous given the ongoing COVID-19 public health crisis. In their official capacities, Judges Warren, Silverman, and Gray are dedicated to promoting and shaping bond reform in favor of a more just system and reducing the number of pre-trial detainees. Unfortunately, inequalities in the justice system are being perpetuated that are often disproportionately felt by minorities and those experiencing poverty.

Judges Warren, Silverman, and Gray offer the following responses to the Plaintiff's Second Amended Class Action Complaint.

ANSWER

1. Judges Warren, Silverman, and Gray admit the following paragraphs of the Second Amended Class Action Complaint: 1-4; 7; 9-10; 14; 24; 30-32; 35-36; 99-101; 104; 110-111; 114; 123; 132; 155; 168-175.

2. Judges Warren, Silverman, and Gray are without sufficient knowledge at this time to admit or deny all or a portion of the following paragraphs of the Second Amended Class Action Complaint: 8; 11; 18-22; 26-27; 37; 44-79; 81-98; 103; 115; 117-122; 133-154; 157; 159-167.

3. Judges Warren, Silverman, and Gray deny a portion or all of the following paragraphs of the Second Amended Class Action Complaint: 5-6; 15; 25; 34; 38-43; 80; 102; 105-109; 112-113; 116; 124-131; 156; 158; 176-204.

4. The following paragraphs of the Second Amended Class Action Complaint require no response: 12-13; 16-17; 23; 28-29; 33.

Defendants Judges Warren, Silverman, and Gray request relief to which they shall show themselves entitled.

Respectfully submitted.

/s/ G. Allan Van Fleet

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CERTIFICATE OF SERVICE

I, G. Allan Van Fleet, hereby certify that on this the 24th day of August, 2020, a true and correct copy of the foregoing document was transmitted using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ G. Allan Van Fleet

G. Allan Van Fleet